



Douglas A. Ducey  
Governor

# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera  
Director

**Submitted online via EPA's Central Data Exchange, State Plan Electronic Collection System (SPeCS)**

June 24, 2021

Deborah Jordan, Acting Regional Administrator  
U.S. Environmental Protection Agency, Region IX  
Mail Code ORA-1  
75 Hawthorne Street  
San Francisco, CA 94105

**RE: Submittal of RACT Certification of Maricopa County Air Quality Department (MCAQD) Rule 348**

Dear Ms. Jordan:

The Arizona Department of Environmental Quality (ADEQ) hereby approves and submits to the U.S. Environmental Protection Agency (EPA) the enclosed Reasonably Available Control Technology (RACT) certification of MCAQD Rule 348 (Aerospace Manufacturing and Rework Operations) as meeting the Clean Air Act, Section 182 RACT requirements for the 2008 8-hour Ozone National Ambient Air Quality Standard (NAAQS) as it is currently written. ADEQ is submitting this RACT Certification pursuant to Arizona Revised Statutes Sections 49-104, 49-106, 49-404, and 49-406, and Code of Federal Regulations (CFR) Title 40, Sections 51.102 through 51.104.

The purpose of the enclosed RACT certification is to address the EPA's disapproval of the negative declaration for aerospace coating the MCAQD originally submitted in 2017 as part of the SIP Revision for the MCAQD Ozone Rules. The EPA finalized disapproval of MCAQD's negative declaration for aerospace coating on January 7, 2021 in the Federal Register (86 FR 971).

ADEQ hereby requests that EPA approve the RACT certification of Rule 348. If you have any questions, please contact Kimberly Butler, Manager of the Planning & Analysis Division at MCAQD at (602) 506-6731 or [Kimberly.Butler@Maricopa.gov](mailto:Kimberly.Butler@Maricopa.gov).

Sincerely,

p.p. *Hether Krause*

Daniel Czecholinski, Director  
Air Quality Division

Enclosure

cc: Elizabeth Adams – [Adams.Elizabeth@epa.gov](mailto:Adams.Elizabeth@epa.gov), EPA  
Doris Lo – [Lo.Doris@epa.gov](mailto:Lo.Doris@epa.gov), EPA  
Daniel Czecholinski – [dc5@azdeq.gov](mailto:dc5@azdeq.gov), ADEQ  
Kimberly Butler – [Kimberly.Butler@Maricopa.gov](mailto:Kimberly.Butler@Maricopa.gov), MCAQD

**Phoenix Office**

1110 W. Washington St. • Phoenix, AZ 85007  
602-771-2300

**Southern Regional Office**

400 W. Congress St. • Suite 433 • Tucson, AZ 85701  
520-628-6733

[azdeq.gov](http://azdeq.gov)